



NOV - 5 2018

Mr. Andrew C. Robertson Wellhead Power Panoche, LLC 650 Bercut Dr Ste C Sacramento, CA 95811

Notice of Final Action - Title V Permit Renewal Re:

> Facility Number: C-3844 Project Number: C-1171376

Dear Mr. Robertson:

The District has issued the Final Renewed Title V Permit for Wellhead Power Panoche, LLC (see enclosure). The preliminary decision for this project was made on September 12, 2018. No comments were received subsequent to the District preliminary decision.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely

Arnaud Mariollet

Director of Permit Services

Enclosures

Tung Le, CARB (w/enclosure) via email CC:

Gerardo C. Rios, EPA (w/enclosure) via email CC:

> Samir Sheikh Executive Director/Air Pollution Control Officer





Facility # C-3844 WELLHEAD POWER PANOCHE, LLC. 650 BERCUT DR STE C SACRAMENTO, CA 95811

Notice of Permit Issuance

The enclosed permit unit requirements authorize the operation of the equipment as described. These permit unit requirements supersede any and all previous permits for the specified equipment.* Please insert these documents into the Facility Permit to Operate, and post copies on or near the equipment as required by District Rule 2010.

Please contact any of our Small Business Assistance (SBA) staff at the numbers below if you have any questions:

Modesto:

(209) 557-6446

Fresno:

(559) 230-5888

Bakersfield:

(661) 392-5665

Samir Sheikh
Executive Director/Air Pollution Control Officer

^{*}Failure to comply with the permit unit requirements may result in enforcement action.





Permit to Operate

FACILITY: C-3844 EXPIRATION DATE: 11/30/2022

LEGAL OWNER OR OPERATOR:

WELLHEAD POWER PANOCHE, LLC.

MAILING ADDRESS:

650 BERCUT DR STE C SACRAMENTO, CA 95811

FACILITY LOCATION:

43649 W PANOCHE RD

FIREBAUGH, CA 93622

FACILITY DESCRIPTION:

POWER GENERATION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Samir Sheikh
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

FACILITY: C-3844-0-2 **EXPIRATION DATE:** 11/30/2022

FACILITY-WIDE REQUIREMENTS

- 1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- 4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- 5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- 6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- 7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District, [District Rule 2040] Federally Enforceable Through Title V Permit
- 8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- 9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
- 22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

- 23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
- 35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

- 36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements, [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT: C-3844-1-9 EXPIRATION DATE: 11/30/2022

EQUIPMENT DESCRIPTION:

49.9 MW NOMINALLY RATED SIMPLE-CYCLE PEAK-DEMAND ELECTRICAL POWER GENERATING SYSTEM CONSISTING OF TWO 25.0 MW PRATT & WHITNEY MODEL #FT4C1 NATURAL GAS-FIRED (TWINPAC CONFIGURATION) GAS TURBINE ENGINES (GTE) WITH DRY LOW NOX (DLN) OR WATER INJECTION TECHNOLOGY, A SHARED SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH OXIDATION CATALYSTS AND INLET AIR FOGGING

PERMIT UNIT REQUIREMENTS

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 3. Both turbine engines shall be operated simultaneously, except during start up and shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Gas turbine engines and generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater except for up to three minutes in any hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Gas turbine engines shall be equipped with a continuous monitoring system to measure and record hours of operation and fuel consumption. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
- 6. Gas turbine engines shall be equipped with a single continuous emissions monitor (CEM) for NOx (before and after SCR system), CO, and O2. The CEM shall meet the requirements of 40 CFR part 60, Appendix F and shall be capable of monitoring emissions during startups and shutdowns as well as during normal operating conditions. [District Rules 2201 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 7. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- 8. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 9. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

- 10. Gas turbine engines shall be fired exclusively on natural gas with a sulfur content of no greater than 1.0 grain of sulfur compounds (as S) per 100 dry scf of natural gas. [District Rules 2201 and 4801, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 11. Combined annual emissions from units C-3844-1 and C-3844-5 shall not exceed any of the following limits: 22,816 lb-NOx/year, 7,068 lb-SOx/year, 16,368 lb-PM10/year, 89,032 lb-CO/year, or 6,448 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Maximum annual heat input for both natural gas-fired turbine engines combined shall not exceed 2,480,000 MMBtu/year, measured on a calendar year period. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Daily combined NOx emissions from both natural gas-fired turbine engines shall not exceed 148.8 lb-NOx/day, measured on a 24 hour rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Annual combined NOx emissions from both natural gas-fired turbine engines shall not exceed 22,816 lb-NOx/year, measured on a calendar year period. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Except during thermal stabilization periods, combined emissions from both natural gas-fired turbine engines shall not exceed any of the following limits: 6.20 lb-NOx/hour (as NO2) equivalent to 2.5 ppmvd @ 15% O2, 1.92 lb-SOx/hour (as SO2), 4.45 lb-PM10/hour, 24.20 lb-CO/hour equivalent to 16.0 ppmvd @ 15% O2, 1.75 lb-VOC/hour (as methane) equivalent to 2.0 ppmv @ 15% O2, or 10 ppmv ammonia @ 15% O2. All emission limits are based on one (1) hour rolling averages. [District Rules 2201 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 16. During periods of thermal stabilization, combined emissions from both natural gas-fired turbine engines shall not exceed any of the following limits: 25.0 lb-NOx/hour (as NO2), 1.92 lb-SOx/hour (as SO2), 4.45 lb-PM10/hour, 24.20 lb-CO/hour, or 1.75 lb-VOC/hour (as methane), based on one hour averages. [District Rules 2201 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 17. Thermal stabilization is defined as the start up or shut down time during which the exhaust gas is not within the normal operating temperature range, not to exceed two hours as stated in Section 3.25 of Rule 4703. [District Rule 4703] Federally Enforceable Through Title V Permit
- 18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
- 19. Compliance testing to measure NOx (as NO2), CO, VOC, ammonia emissions, and fuel gas sulfur content requirements of this permit shall be conducted at least once every twelve months. [District Rules 2201 and 4703, and 40 CFR 60 Subpart GG] Federally Enforceable Through Title V Permit
- 20. Compliance testing to measure PM10 shall be conducted at least once every 60 months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Compliance testing to measure NOx (as NO2), CO, and ammonia emissions shall be conducted within 60 days of switching the turbine combustion emission control technology from Dry Low NOx (DLN) to water injection technology, or vice versa. [District Rules 2201 and 40 CFR 60 GG] Federally Enforceable Through Title V Permit
- 22. Compliance testing shall be required at least once per twelve-month period for which the technology is used. Switching the turbine combustion emission control technology from Dry Low NOx (DLN) to water injection technology, or vice versa, shall not be required solely for source testing purposes. [District Rule 2201 and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 23. Compliance with ammonia slip limit shall be demonstrated by using the following calculation procedure: ammonia slip ppmv @ 15% O2 = {[a-(b x c/1,000,000)] x 1,000,000/b}, where a = ammonia injection rate (lb/hr)/17 (lb/lb mol), b = dry exhaust gas flow rate (lb/hr)/29 (lb/lb mol), and c = change in measured NOx concentration ppmv at 15% O2 across the catalyst. [District Rule 4102]
- 24. Compliance testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

- 25. The following test methods shall be used, PM10: EPA Method 5 (front half and back half), NOx: EPA Method 7E or 20, CO: EPA Method 10 or 10B, O2: EPA Method 3, 3A, or 20, VOC: EPA Method 18 or 25, ammonia: BAAQMD ST-1B, and fuel gas sulfur content: ASTM D3246. Alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703, and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 26. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 27. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 28. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F, 5.11, at least once every four calendar quarters. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 29. Demonstration of compliance with the annual average sulfur content limit shall be demonstrated by a 12 month rolling average of the sulfur content either (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) tested using ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 1081 and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 30. Excess emissions shall be defined as any operating hour in which the 4-hour or 30-day rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 31. The permittee shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60, GG] Federally Enforceable Through Title V Permit
- 32. The permittee shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit when no continuous emission monitoring data for NOx is available or when continuous emission monitoring system is not operating properly. [District Rule 4703] Federally Enforceable Through Title V Permit
- 33. The owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit
- 34. The permittee shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor.

 [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
- 35. The permittee shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, and calculated NOx mass emission rates (lb/hr). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

36. All records shall be maintained, retained on-site for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 11/30/2022 PERMIT UNIT: C-3844-3-2

EQUIPMENT DESCRIPTION:

440 BHP CATERPILLAR MODEL 3406 TA DIESEL-FIRED LOW USE IC ENGINE POWERING A COMPRESSOR TO START THE GAS TURBINES (C-3844-1)

PERMIT UNIT REQUIREMENTS

- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115] Federally Enforceable Through Title V Permit
- This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. Total time shall include all operational use and operation for maintenance and testing purposes. [District Rule 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
- Operation of this engine for all purposes shall not exceed 1 hour per day and 50 hours per year. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- Emissions from this engine shall not exceed any of the following limits: 6.9 g-NOx/hp-hr, 3.03 g-CO/hp-hr or 1.12 g-VOC/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
- Emissions from this engine shall not exceed 0.1 g-PM10/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
- 10. The permittee shall maintain daily and annual records of operation. Records shall include the date, the number of hours of operation, the quantity of diesel fuel used, and the purpose of the operation (e.g., startup of turbine, testing, maintenance, etc.). Such records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 4702, and 40 CFR 60 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 11. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 12. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: WELLHEAD POWER PANOCHE, LLC.

- 13. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 14. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 15. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 16. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 17. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 18. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT: C-3844-5-3

EXPIRATION DATE: 11/30/2022

EQUIPMENT DESCRIPTION:

329 BHP CAT MODEL #G379 RICH-BURN NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR AND SERVED BY A 3-WAY CATALYST

PERMIT UNIT REQUIREMENTS

- 1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
- 2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
- 4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
- 5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
- 7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
- 8. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
- 9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 10. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- 11. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
- 12. The permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit

Facility Name: WELLHEAD POWER PANOCHE, LLC. Location: 43649 W PANOCHE RD, FIREBAUGH, CA 93622 C-3844-5-3: Oct 31 2018 3:55PM – GARCIAC

- 13. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
- 14. Combined annual emissions from units C-3844-1 and -5 shall not exceed any of the following limits: 22,816 lb-NOx/year, 7,068 lb-SOx/year, 16,368 lb-PM10/year, 89,032 lb-CO/year, and 6,448 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmvd NOx @ 15% O2 (equivalent to 0.072 g-NOx/hp-hr), 0.0104 g-SOx/hp-hr, 0.071 g-PM10/hp-hr, 670 ppmvd CO @ 15% O2 (equivalent to 5.69 g-CO/hp-hr), or 25 ppmvd VOC @ 15% O2 (equivalent to 0.125 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
- 16. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
- 17. Source testing to measure natural gas-combustion NOx, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit
- 18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702]
- 19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
- 20. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, CO (ppmv) EPA Method 10 or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
- 21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 23. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
- 24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

- 26. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 27. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 28. The engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 29. The engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 30. The engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 31. The permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 32. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
- 33. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of the operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of the action(s) taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning operation and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit